



April 9, 2009

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Santa Ana Region
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Sent via email

RE: Comments on Second Draft of Tentative Order R8-2009-0030 NPDES No. CAS618030 Renewal of **Waste Discharge Requirements for the County of Orange, Orange County Flood Control District and the Incorporated Cities of Orange County within the Santa Ana Region, Areawide Urban Storm Water Runoff Management Program, Orange County.**

As a drinking water utility, Golden State Water Company (GSWC) has a vested interest in preserving the quality of our streams and underground aquifers. GSWC supports the Santa Ana Regional Board's efforts as a partner in protecting our drinking water resources and appreciates the opportunity to comment on the above referenced Waste Discharge Requirements.

GSWC is dedicated to providing our customers with water that meets strict State and Federal drinking water standards. In order to meet drinking water standards, we have a variety of discharges from our drinking water system to the storm drain system for routine operations and maintenance. The flushing of the drinking water system is an approved and necessary activity to protect public health and safety. Routine potable water line flushing is encouraged by the California Department of Public Health (DPH) and the American Water Works Association, and at times is required by the DPH. GSWC has previously had coverage of these types of discharges under several permits, including CAG998001.

After review of the second draft of CAS618030, GSWC is looking for some clarification on the board's intent to cover discharges from drinking water providers.

The second draft of CAS618030, paragraph III.3.ii states:

"The permittees shall prohibit the following categories of non-storm water discharges unless the stated conditions are met:

- a) The de minimus types of discharges listed in the General De Minimus Permit shall be in compliance with the Regional Board's General De Minimus permit for Discharges to Surface Waters, Order No. R8-2009-0003, NPDES NO. CAG*

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998001, except that the separate coverage under the General De Minimus Permit is not required.

- b) Discharges from potable water sources, including water line flushing, superchlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water: Planned discharges shall be dechlorinated to a concentration of 0.1ppm or less, pH adjusted if necessary, and volumetrically and velocity controlled to prevent causing hydrologic conditions of concern in receiving waters.”

On March 27th, CAG998001 Order No. R8-2009-0003 was renewed with the following language in paragraph VII.C.6.f:

*“As appropriate, the regulation of the following types of discharges by **MS4 permittees** (emphasis added) shall be transferred to the MS4 permits issued to the cities, municipalities and Counties within the Santa Ana Region, when updated MS4 permits with applicable terms and conditions necessary to address the regulation of these discharges are adopted and effective.*

- (1) Dewatering wastes from subterranean seepage, except for discharges from utility vaults;*
- (2) Discharges resulting from hydrostatic testing of vessels, pipelines, tanks, etc.;*
- (3) Discharges resulting from the maintenance of potable water supply pipelines, tanks, reservoirs, etc.;*
- (4) Discharges resulting from the disinfection of potable water supply pipelines, tanks, reservoirs, etc.;*
- (5) Discharges from potable water supply systems resulting from initial system startup, routine startup, sampling of influent flow, system failures, pressure releases, etc.;*
- (6) Discharges from fire hydrant testing or flushing;*
- (7) Air conditioning condensate;*
- (8) Swimming pool discharge;*
- (9) Discharges resulting from diverted stream flows; and*
- (10) Construction dewatering wastes.*

GSWC is seeking clarification if the board’s intent is to 1) regulate discharges from all potable water suppliers under the CAS618030 or 2) regulate only those potable water suppliers who are also MS4 permittees under CAS618030 while regulating the remaining special districts and private water companies that supply potable water to the public under CAG998001.

Thank you again for the opportunity to comment and seek clarification on proposed waste discharge requirements. If you have any questions or need more information, please contact Brandyn O’Gorman at (916) 853-3639.

Sincerely,

Brandyn O’Gorman

Manager of Environmental Compliance
Golden State Water Company

cc: Mr. Marc Brown, RWQCB
Mr. David Chang, GSWC